

Vincent P. Slusher
State Bar No. 00785480
vincent.slusher@dlapiper.com
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 743-4572
Facsimile: (972) 813-6267

Thomas R. Califano
New York State Bar No. 2286144
thomas.califano@dlapiper.com
Jeremy R. Johnson
New York State Bar No. 4307617
jeremy.johnson@dlapiper.com
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020-1104
Tel: (212) 835-6000
Fax: (212) 835-6001

PROPOSED ATTORNEYS FOR LINCOLNSHIRE
CAMPUS, LLC AND NAPERVILLE CAMPUS, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	§ Chapter 11
LINCOLNSHIRE CAMPUS, LLC,	§	§ Case No. 10-34176-11
Debtor.	§	§
§	§	§
§	§	§
In re:	§	§ Chapter 11
NAPERVILLE CAMPUS, LLC,	§	§ Case No. 10-34177-11
Debtor.	§	§
§	§	§
In re:	§	§ Chapter 11
SEDGEBROOK INC.,	§	§ Case No. 10-34178-11
Debtor.	§	§
§	§	§

In re:
MONARCH LANDING, INC.,
Debtor.

§ Chapter 11
§ Case No. 10-34179-11
§

**MOTION FOR ORDER DIRECTING JOINT
ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES**

Lincolnshire Campus LLC (“Lincolnshire”) and Naperville Campus LLC (“Naperville”) debtors and debtors in possession by their proposed attorneys, DLA Piper LLP (US) and Monarch Landing, Inc. (“Monarch”), and Sedgebrook Inc. (“Sedgebrook”), debtors and debtors in possession by their proposed attorneys Whiteford, Taylor & Preston, L.L.P. and McGuire Craddock & Strother, P.C., (collectively, the “Debtors”) move (the “Motion”) this Court for entry of an order, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1015.1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Texas, requesting the entry of an order consolidating their separate chapter 11 cases for procedural purposes only, and providing for joint administration thereof. In support of this Motion, the Debtors respectfully represent as follows:

Jurisdiction and Venue

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicate for the relief sought herein is Bankruptcy Rule 1015(b).

Background

4. On June 15, 2010 (the “Petition Date”), the Debtors commenced these chapter 11 cases by each filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

5. The Debtors remain in possession of their assets and continue to operate and manage their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107 and 1108.

6. No trustee, examiner or committee has been appointed in any of the Debtors’ chapter 11 cases.

Relief Requested

7. By this Motion, the Debtors seek an order consolidating, for procedural purposes only, the administration of the Debtors’ chapter 11 cases.

8. Bankruptcy Rule 1015(b) provides that, if two or more petitions are pending in the same court by a debtor and an affiliate, the court may order the joint administration of the estates of the debtor and such affiliates. See Fed. R. Bankr. P. 1015(b).

9. Lincolnshire Campus, LLC, and Naperville Campus, LLC, are wholly-owned subsidiaries of Erickson Retirement Communities, LLC (“ERC”). Currently pending in this Court are eighteen Chapter 11 cases involving ERC and numerous affiliates which cases are consolidated under Case No. 09-37010-SGJ-11. Those cases were filed on October 19, 2009 and on April 16, 2010 this Court entered an Order confirming the ERC’s Fourth Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code (the “ERC Plan”).

10. Debtors Sedgebrook and Monarch are not for profit corporations that lease, pursuant to master leases, the land and improvements owned by Lincolnshire and Naperville.

Sedgebrook and Monarch operate senior living communities on the campuses owned by Lincolnshire and Naperville.

11. Pursuant to the ERC Plan, the old ERC became Senior Living Retirement Communities LLC and all rights to the name ERC were transferred to Redwood-ERC Senior Living Holdings LLC. The ERC Plan further provided that the management of Sedgebrook and Monarch Landing (both formerly managed by ERC) would continue to be managed by Senior Living Retirement Communities LLC (“Senior Living”), the successor by name change to ERC under the ERC Plan. Senior Living has subcontracted certain of its management duties to Erickson Senior Living, Inc., but remains the manager of Sedgebrook and Monarch.

12. Based upon the foregoing, each of the Debtors is related within the meaning of Bankruptcy Rule 1015(b) and accordingly, this Court may order the joint administration of the Debtors’ estates.

13. The Debtors anticipate that notices, applications, motions, other pleadings, hearings and orders in these cases may affect more than one of the Debtors or each of the Debtors. If each Debtor’s case were administered independently, there would be a number of duplicative pleadings and overlapping service. This unnecessary duplication of identical documents would be wasteful of the Debtors’ resources, as well as other parties’ and this Court’s resources.

14. Joint administration will permit the Clerk of the Court to use a single general docket for each of the Debtors’ cases and to combine notices to creditors and other parties in interest of the Debtors’ respective estates. Joint administration also will protect parties in interest by ensuring that all parties in interest will be able to review one docket to stay apprised of the various matters before the Court in each of the Debtors’ cases.

15. A proposed consolidated caption for all notices, applications, motions and other pleadings is annexed hereto as Exhibit A.

16. The Debtors request that a docket entry reflecting the joint administration of the Debtors' cases be made in each of the Debtors' cases as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Lincolnshire Campus, LLC, Monarch Landing Inc, Naperville Campus, LLC, and Sedgebrook Inc. The docket in Case No. 10-34176-11 should be consulted for all matters affecting this case.

17. Finally, the Debtors request that all future entries for all cases be made under the lead case In re Lincolnshire Campus, LLC, Case No. 10-34176-11.

Notice

18. Notice of this Motion has been provided to (a) the Office of the United States Trustee for the Northern District of Texas; (b) the Debtors' twenty largest unsecured creditors; and (c) counsel to the prepetition secured lenders. The Debtors submit that, in light of the nature of the relief requested, no other or further notice is necessary or required.

WHEREFORE, the Debtors respectfully request that the Court enter an order substantially in the form annexed hereto as Exhibit B, granting the relief requested herein and granting such other relief as may be deemed just and proper.

Dated: June 15, 2010
Dallas, Texas

DLA PIPER LLP (US)

By: /s/ Vincent P. Slusher
Vincent P. Slusher
State Bar No. 00785480
vincent.slusher@dlapiper.com
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 743-4572
Facsimile: (972) 813-6267

Thomas R. Califano
New York State Bar No. 2286144
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Jeremy R. Johnson
New York State Bar No. 4307617
jeremy.johnson@dlapiper.com
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020-1104
Tel: (212) 835-6000
Fax: (212) 835-6001

Proposed Attorneys for Lincolnshire
and Naperville

and

MCGUIRE, CRADDOCK & STROTHER, P.C.

J. Mark Chevallier, Texas Bar No.04189170
James G. Rea, Texas Bar No. 24051234
2501 N. Harwood, Ste. 1800
Dallas, TX 75201
(214) 954-6800 Telephone
(214) 954-6850 Facsimile
Email: mchevallier@mcslaw.com
Email: jrea@mcslaw.com

and

Martin T. Fletcher, MD Bar No. 07608
Stephen F. Fruin, MD Bar No. 08456
Thomas J. Francella, Jr., DE Bar. No. 03835
Whiteford Taylor and Preston, L.L.P.
Seven Saint Paul Street
Baltimore, MD 21202
(410) 347-8700 Telephone
(410) 752-7092 Facsimile
Email: mfletcher@wtplaw.com
Email: sfruin@wtplaw.com
Email: tfrancella@wtplaw.com

Proposed Attorneys for Sedgebrook and Monarch

Exhibit A

Proposed Caption

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § **CASE NO. 10-34176-11**
LINCOLNSHIRE CAMPUS, LLC et al. §
§
§
§
§
¹ **CHAPTER 11**
Jointly Administered

¹ The Debtors in these chapter 11 cases are Lincolnshire Campus, LLC, Monarch Landing Inc, Naperville Campus, LLC, and Sedgebrook Inc.

Exhibit B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	§ Chapter 11
LINCOLNSHIRE CAMPUS, LLC,	§	Case No. 10-34176-11
Debtor.	§	
<hr/>		
In re:	§	Chapter 11
NAPERVILLE CAMPUS, LLC,	§	Case No. 10-34177-11
Debtor.	§	
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In re:	§	Chapter 11
SEDGEBROOK INC.,	§	Case No. 10-34178-11
Debtor.	§	
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In re:	§	Chapter 11
MONARCH LANDING, INC.,	§	Case No. 10-34179-11
Debtor.	§	
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**ORDER DIRECTING JOINT ADMINISTRATION
OF THE DEBTORS' CHAPTER 11 CASES**

Upon the Motion for an Order Directing Joint Administration of the Debtors' Chapter 11 Cases, dated June 15, 2010 (the "Motion"); and all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. §157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and

1409, and due and proper notice of the Motion having been provided to the necessary parties; and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion (the “Hearing”); and the appearances of all interested parties having been noted in the record of the Hearing; and upon the record of the Hearing and all of the proceedings had before the Court; and no objections having been received; and the Court having determined that the relief sought in the Motion is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the above-captioned chapter 11 cases are consolidated for procedural purposes only and shall be jointly administered by the Court; and it is further

ORDERED that parties in interest are directed to use the proposed caption annexed hereto as Exhibit 1 when filing pleadings with the Court in the chapter 11 cases of the Debtors indicating that each pleading relates to the jointly administered chapter 11 cases of “Lincolnshire Campus, LLC, et al.” The consolidated caption satisfies the requirements of section 342(c) of the Bankruptcy Code in all respects; and it is further

ORDERED that a docket entry shall be made in each of the Debtors’ cases substantially as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Lincolnshire Campus, LLC, Monarch Landing, Inc., Naperville Campus, LLC, and Sedgebrook, Inc. The docket in Case No. 10-34176-11 should be consulted for all matters affecting this case.

And it is further

ORDERED that the Debtors are authorized and empowered to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion; and it is further

ORDERED that this Court will retain jurisdiction to address all disputes related to the interpretation or enforcement of this Order.

###End of Order###

Exhibit 1

Official Caption

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § **CASE NO. 10-34176-11**
LINCOLNSHIRE CAMPUS, LLC et al. §
§
§
§
§
¹ **CHAPTER 11**
Jointly Administered

¹ The Debtors in these chapter 11 cases are Lincolnshire Campus, LLC, Monarch Landing Inc, Naperville Campus, LLC, and Sedgebrook Inc.